

<b>U.S. DEPARTMENT OF ENERGY (DOE)</b> <b>NATIONAL TRANSPORTATION PROGRAM, ALBUQUERQUE (NTP-A)</b> <b>Standard Operating Procedure</b>			
<b>Title: NTP-A and/or Field Office Requirements for the Planning, Conducting, Documenting, Reporting, and Tracking of Compliance Evaluation Activities</b>			
Procedure No: <b>NTP-A-TCEAP.002</b>	Revision No: <b>1</b>	Date: <b>July 2000</b>	Page: <b>1 of 15</b>

## **1.0 PURPOSE**

To specify a consistent approach to planning, conducting, documenting, reporting, and tracking of compliance evaluation activities of contractor transportation, traffic, packaging, and logistics operations by National Transportation Program, Albuquerque (NTP-A) and/or the responsible DOE Field Office. This procedure meets the requirements identified as activity two in the TCEAP Management Plan.

## **2.0 SCOPE**

Provide requirements and approach for NTP-A and/or DOE Field Office to evaluate contractor transportation and/or packaging organization activities affecting transportation operating systems and the capability to ensure implementation in accordance with applicable requirements and specifications.

This procedure applies to NTP-A, DOE Field Office and contractor transportation and packaging organization personnel performing transportation-related tasks and activities.

## **3.0 REQUIREMENTS, REFERENCES AND DEFINITIONS**

### **3.1 Requirements**

- a. National Transportation Program "Transportation Compliance Evaluation/Assistance Program (TCEAP) Management Plan"
- b. DOE Order 460.1A, "Packaging and Transportation Safety," October 2, 1996.
- c. DOE G 460.1-1, "Implementation Guide for Use With DOE O 460.1A," June 5, 1997.
- d. DOE Order 460.2, Change 1, Version 1, "Departmental Materials Transportation and Packaging Management," September 27, 1995.
- e. DOE G-460.2-1, "Implementation Guide for Use With DOE Order 460.2, "Departmental Materials Transportation and Packaging Management," November 15, 1996.

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- f. DOE Order 200.1, "Information Management Program," September 30, 1996
- g. Title 10, Code of Federal Regulations
- h. Title 40, Code of Federal Regulations
- i. Title 41, Code of Federal Regulations
- j. Title 49, Code of Federal Regulations

### 3.2 References

- a. DOE Order 414.1A, "Quality Assurance," September 29, 1999.
- b. DOE G 414.1A, "Quality Assurance Management System Guide for Use With 10 CFR 830.120 and DOE O 414.1," June 17, 1999.

### 3.3 Definitions

- a. Corrective Action Plan - A memorandum, letter, or action plan; written by the evaluated organization in response to the final Transportation Compliance Evaluation/Assistance Program (TCEAP) Report. This response should contain a description of the corrective action to be taken for each evaluation observation; a schedule for implementation of corrective action; and a detailed explanation regarding any disputed observations.
- b. Deficiency - A condition of an activity, attribute, documentation, or procedure that renders it unacceptable, indeterminate, or noncompliant.
- c. Evaluation - The act of reviewing, inspecting, testing, checking, surveilling, auditing, or otherwise determining and documenting whether items, processes, or services meet specified requirements. For the purposes of this document, the terms "audit," "verification," and "evaluation" are considered to be synonymous.
- d. Evaluation Program Coordinator - A DOE employee or designated contractor who coordinates, implements, and administers TCEAP activities. If requested, the EPC may assist NTP-A and/or Field Offices in selecting members for the evaluation team and/or in organizing and directing the evaluation process.
- e. Evaluation Team - The individual(s) tasked to conduct a specific evaluation at the same time as other evaluators or subject-matter experts.

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- f. Evaluation Team Leader - The DOE personnel responsible for authorizing or requesting a specific evaluation. Depending on the activity being evaluated, the Evaluation Team Leader (ETL) could be NTP-A, Field Office or Program Office management personnel. The ETL assumes a leadership role during pre-evaluation, evaluation, and post-evaluation activities. The ETL also provides contractor management interface.
- g. Evaluator - An individual who, by qualification of experience, training, and/or education participates on the evaluation team as a subject-matter expert and can fulfill specific requirements related to the TCEAP process.
- h. Nonconformance - The nonfulfillment of a specific requirement. For the purpose of this document, nonconformance and noncompliance are considered to be synonymous.
- i. Objective Evidence - Information that can be proved true based on facts obtained through observations, measurement, test, or other means.
- j. Observation - A statement of fact made during an evaluation and substantiated by objective evidence.
- k. Self-Assessment - An assessment of work by its performer; according to specified rules.

## **4.0 GENERAL**

**4.1** Evaluation activities are performed, as specified in DOE Order 460.2, to verify that all applicable requirements are being met. Evaluation activities are conducted to:

- a) Determine existence of a documented management system for the performance of activities and work
- b) Evaluate adequacy of management systems to meet applicable requirements
- c) Determine if management and work activities are being implemented in accordance with established systems, procedures, regulations and policies
- d) Determine the effectiveness of the system in producing the desired result of the appropriate quality
- e) Monitor work in progress
- f) Document compliance or noncompliance with requirements, policies, and

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- procedures
- g) Identify actual and potential deficiencies and nonconformances promptly
- h) Promote prompt corrective action by management responsible for performing work
- i) Provide management information on compliance and quality-affecting activities
- j) Track and verify timely implementation of corrective actions
- k) Promote continuous improvement in work activities.

**4.2** An evaluation team may consist of one or more persons. Where only one person performs the evaluation activity, that individual shall assume responsibilities of the evaluation team leader.

**4.3** Evaluation activities shall be performed by personnel who meet requirements of the TCEAP Management Plan and are knowledgeable in the activities being evaluated.

**4.4** The final TCEAP report format will consist of the following sections:

- a. Table of Contents
- b. Introduction
- c. Scope
- d. Summary of Observations/Recommendations
- e. Assistance Activity
- f. Conclusion
- g. Completed TCEAP Evaluation Form(s)

**4.5** Follow-up and close-out of corrective action items (nonconformances) are the responsibility of the evaluation team leader for the program requesting the TCEAP. If NTP-A was not the requesting program, the final close-out letter will be submitted to NTP-A for tracking purposes.

## **5.0 PROCEDURE**

**Attachment A** contains a flow chart depicting the overall work process associated with this procedure.

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## **6.0 RECORDS**

Documents generated as a result of this procedure shall be identified, classified, and prepared in accordance with DOE Order 200.1, and managed with respect to requirements specified in DOE G 200.1. At a minimum, the following are to be considered Quality Assurance (QA) records:

- 6.1 Evaluation Notification Memorandum or Letter
- 6.2 Attendance Record Form(s)
- 6.3 Evaluation Report
- 6.4 Evaluation Response(s)
- 6.5 Response Disposition Letter(s)

## **7.0 ATTACHMENTS**

- 7.1 Attachment A: Compliance Evaluation - Process Flow Diagram
- 7.2 Attachment B: Attendance Record Form (Example)
- 7.3 Attachment C: TCEAP Evaluation Form
- 7.4 Attachment D: Observation/Recommendation Priority Levels

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## **8.0 REVISION LISTING**

<b><u>Revision Number</u></b>	<b><u>Description</u></b>	<b><u>Revision Date</u></b>
0	NTP-A-TCEAP.002	July 1999
1	NTP-A-TCEAP.002	July 2000

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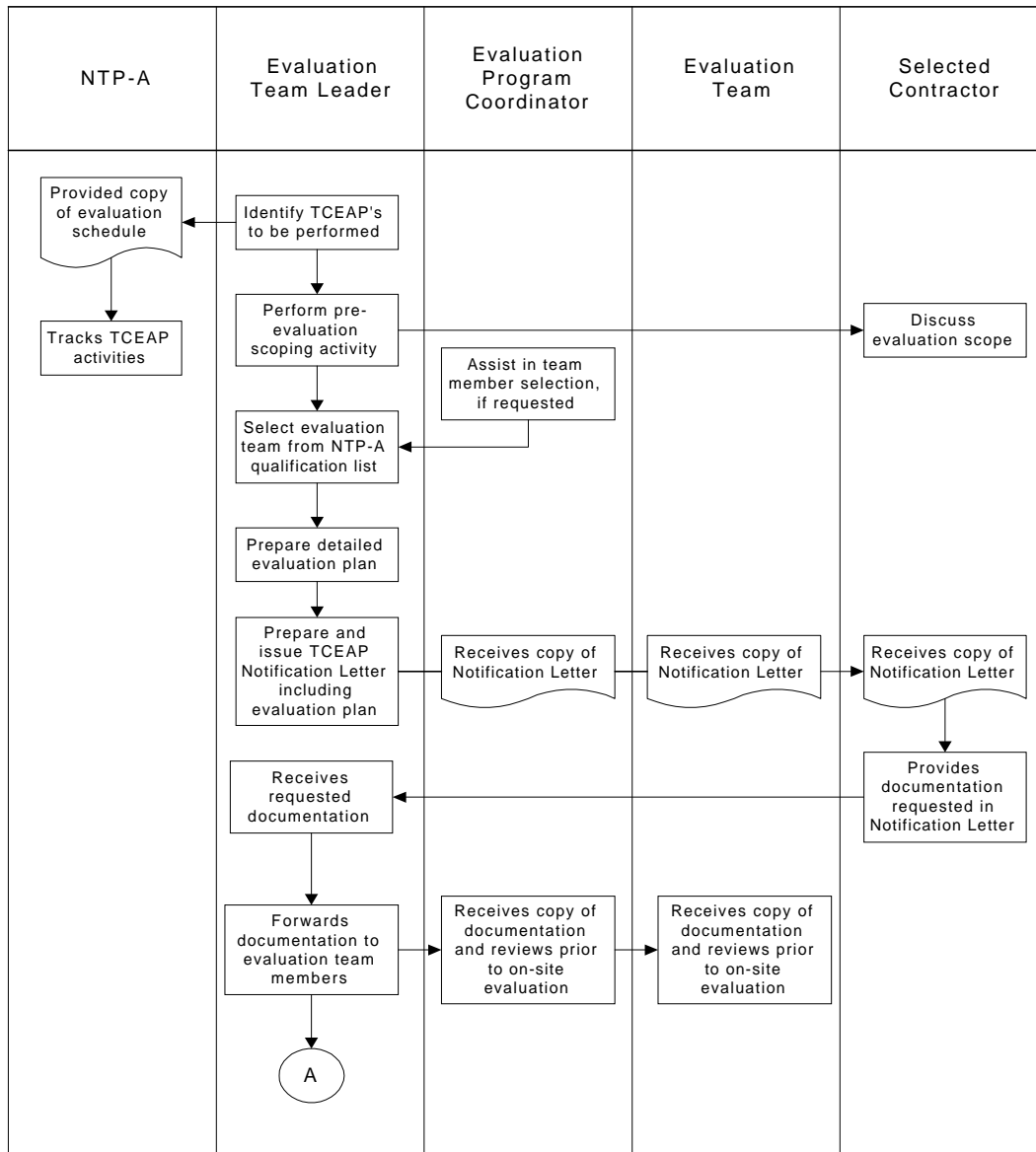
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**Attachment A**  
**NTP-A and/or Field Office Compliance Evaluation**  
**Process Flow Diagram**



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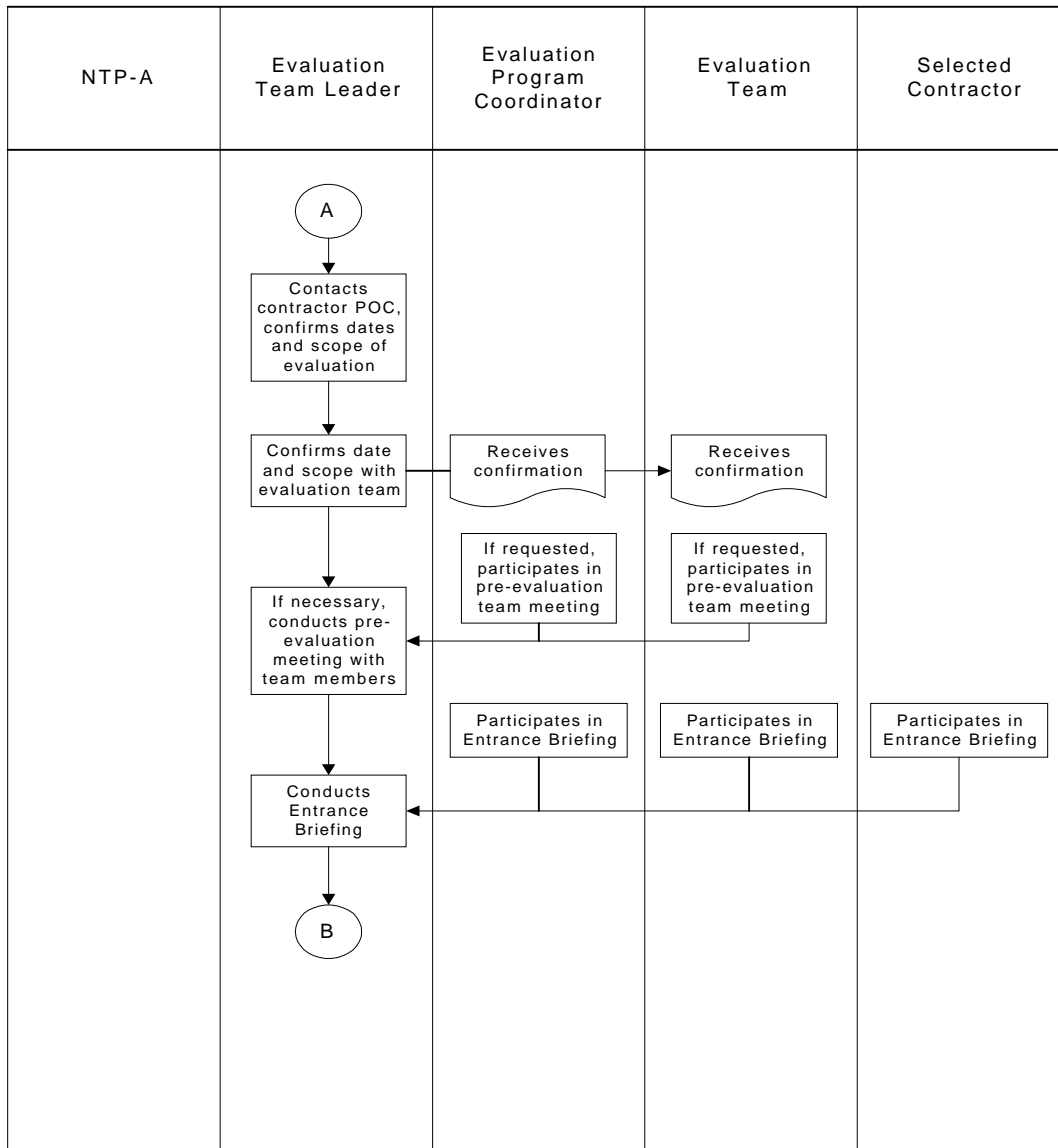
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Attachment A (cont.)  
NTP-A and/or Field Office Compliance Evaluation  
Process Flow Diagram





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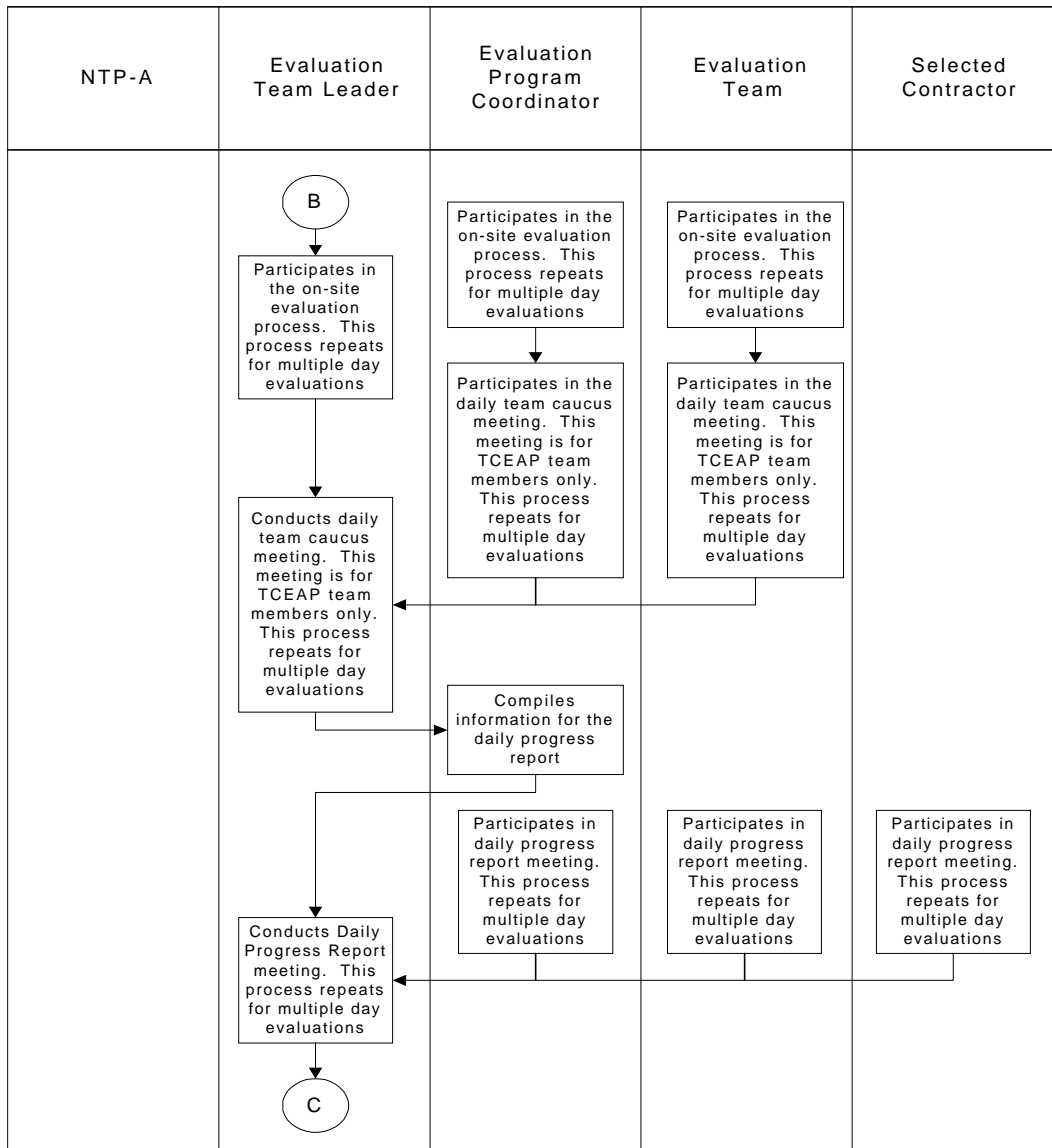
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Attachment A (cont.)  
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Process Flow Diagram



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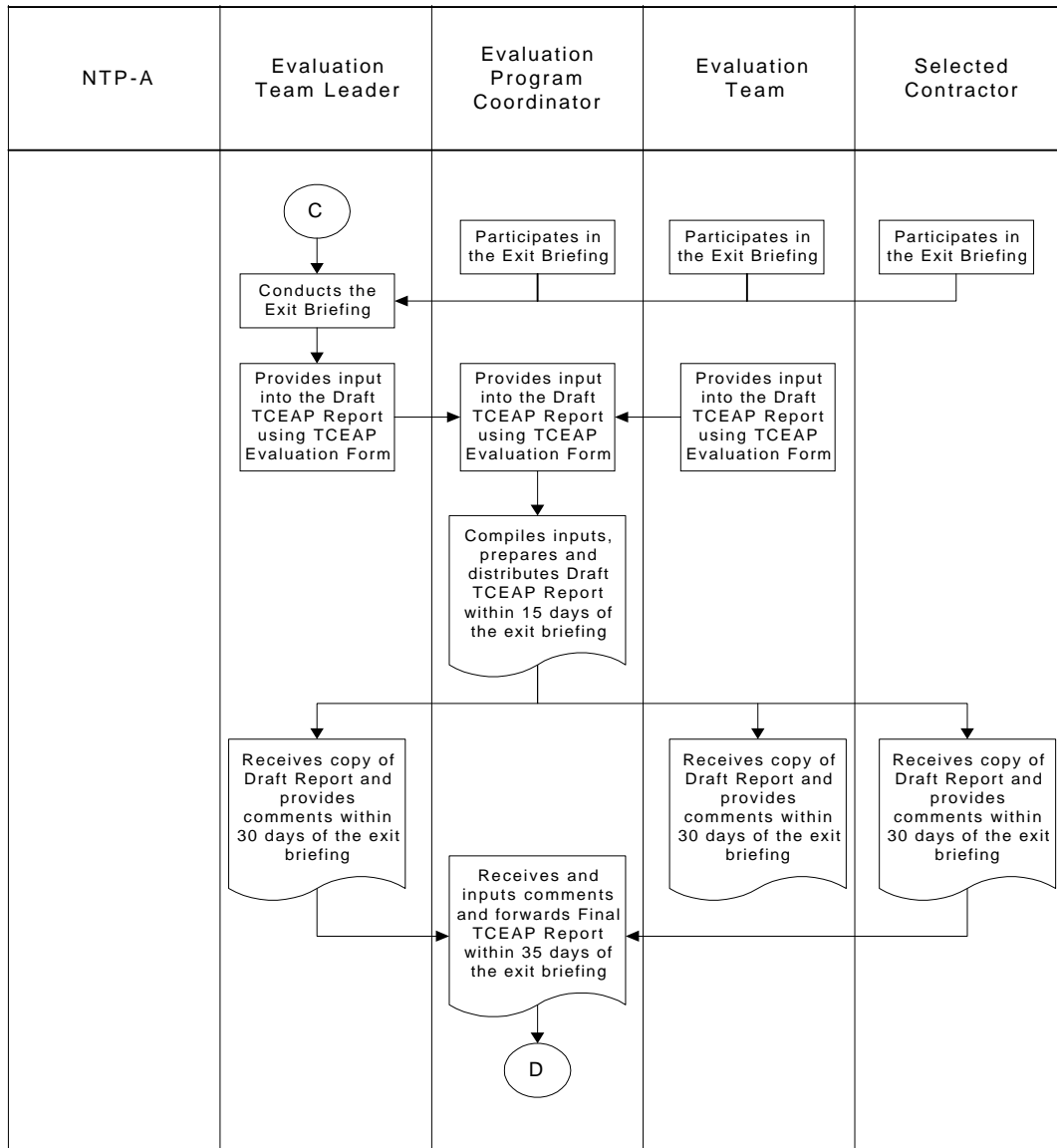
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Attachment A (cont.)  
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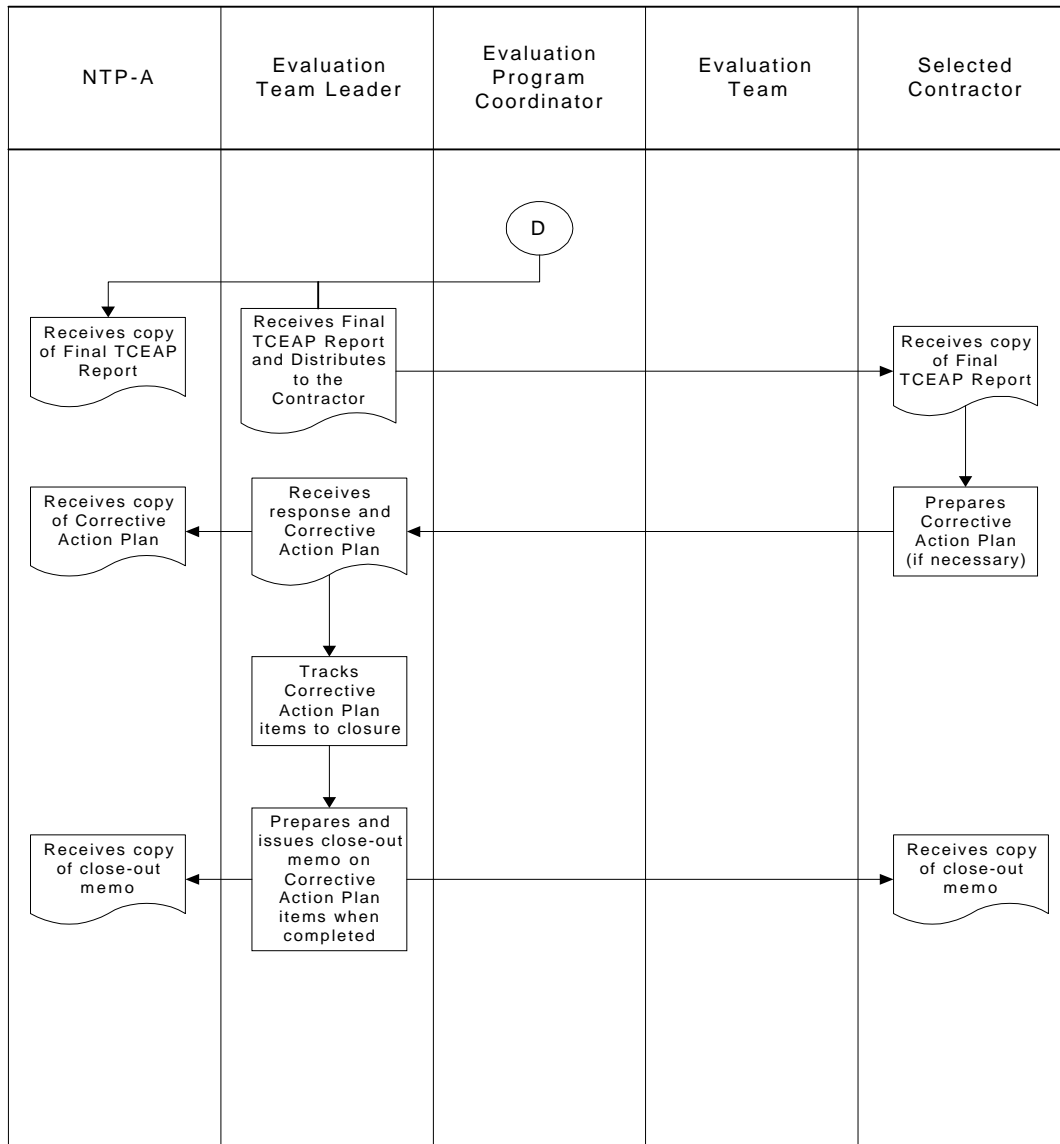
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Attachment A (cont.)  
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Attachment B  
Attendance Record Form (example)

**TCEAP ATTENDANCE RECORD FORM**

Sheet      of

Date:

☐ EVALUATION      ☐ PRE-EVALUATION MEETING      ☐ DAILY PROGRESS REPORT  
☐ ASSISTANCE      ☐ ENTRANCE BRIEFING      ☐ EXIT BRIEFING  
☐ OTHER:      ☐ TEAM CAUCUS MEETING

EVALUATION TEAM LEADER

Signature

Date

BRIEF SUMMARY OF MATERIAL COVERED:

NAME OF ATTENDEE

COMPANY

PHONE NUMBER

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Attachment C  
TCEAP Evaluation Form instructions

**TCEAP EVALUATION FORM**

<b>FUNCTIONAL AREA:</b>  <b>EVALUATOR:</b>	<b>OBJECTIVE:</b> <b>DATE:</b> <b>TEAM LEADER:</b>	<b>CRITERIA MET:</b>	
		<b>YES</b> <input type="checkbox"/>	<b>NO</b> <input type="checkbox"/>

**OBJECTIVE:**

The objective described in the TCEAP Management Plan for the area to be evaluated is listed.

**CRITERIA:**

The criteria to be checked and/or evaluated are listed here. A separate checklist has been developed for evaluation purposes.

**APPROACH:**

Record Review: Describes the records review process or the records to be reviewed.

Interviews: Describes the interview process and how interviews should be performed.

Performance Observation: Describes the observation process to be performed.

**The first three sections (objective, criteria and approach) are already filled out for the evaluator. This is the same for self-assessments.**

**LIST RECORDS REVIEWED:**

The evaluator lists here all of the documents that were reviewed by name, title, number, etc.

**LIST INTERVIEWS CONDUCTED:**

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All interviews conducted by the evaluator are listed here by title only. Names of specific individuals are not used.

**LIST PERFORMANCE OBSERVATIONS MADE:**

Performance observations witnessed by the evaluator (e.g. shipment preparation, etc.) during the evaluation process are listed here.

**DISCUSSION OF RESULTS:**

In this narrative section of the evaluation form, the evaluator describes what took place during the evaluation process. All comments made that pertain to the document review, interviews, and performance observations will be demonstrated in narrative form.

**CONCLUSION:**

The individual evaluator provides the summary conclusion of the evaluation.

**OBSERVATION(S):**

Observation 01. List each observation made (include level identification) here.

Reference/Requirement:

List all references here to identify the actual requirement identified in the observation statement above.

Recommendation:

Provide a recommendation to bring the particular observation into compliance with the requirement listed above.

**Observation steps are repeated as many times as necessary. If no observations are noted then “none” should be the response in the Observation section.**

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## Attachment D Observation Performance Levels

The Regulatory Compliance section describes transportation- and packaging-related observations that are considered to be unsafe or out of regulatory compliance. Observations are ranked by the entire evaluation team with consideration given to impacts on transportation and packaging operations in the areas of safety, regulatory compliance, and best management practice. These concerns are ranked and discussed in the following order:

Level 1: Transportation- and packaging-related observations that are; or are perceived to be; an imminent danger or significant safety hazard to workers, the public, or the environment. The lead DOE representative has the authority to recommend or issue a “stopwork” order for activities identified as Level 1 action items.

Level 2: Observations that are developed from an evaluation of transportation- and packaging-related activities and indicate the management system is not in control. These observations represent the overall evaluation of the operation, activity, organization or contractor regulatory and policy compliance status.

Level 3: Individual transportation- and packaging-related activities that are; or are perceived to be; in violation of federal regulations, DOE Orders, or other applicable regulatory and policy requirements, but can be used to demonstrate management systems are in control.

The Best Management Practice component addresses concerns that, if improved, would result in safer, more efficient transportation operations and activities. This component also addresses implementation of transportation- and packaging-related standards, costs, mission impacts, and potential external reactions. These concerns are ranked and discussed in the following order:

Level 4: Observations that represent the evaluation team's overall evaluation of the operation, activity, organization, or contractor status in terms of best management practice implementation.

Level 5: Individual transportation- and packaging-related observations that deviate significantly from transportation or packaging industry standards and may impact cost and/or mission if left uncorrected.

Level 6: Recommendations that are made to enhance a process or procedure, but do not indicate a violation of regulation, policy, or procedure has taken place. Recommendations may also be listed as “assistance activity” in the Final Evaluation Report.